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| UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY | |
| Albert Russo PO Box 4853 Trenton, NJ 08650 (609) 587-6888 Standing Chapter 13 Trustee | |
| In re: Gail D. Aherne-Miller Debtor(s) | Case No. 23-12562 / MBK Hearing Date: May 24, 2023 10:00 am Judge: Michael B. Kaplan Chapter: 13 |

TRUSTEE'S OBJECTION TO DEBTOR(S) CHAPTER 13 PLAN

Albert Russo, Standing Chapter 13 Trustee, objects to the Debtor(s) Plan for the following reason(s):

The debtor has failed to supply the Trustee with the following document (s):

Need a copy of the will of Marion Ahearne and any probate documents available.

The Plan provides for payment on unsecured claims of less than that which would be distributed upon liquidation under Chapter 7, as prohibited by 11 U.S.C. § 1325(a)(4): There is \$205,142.00 in non exempt equity in the residence.

There is non exempt equity of \$6,450 in the Nissan, \$625 in the jewelry and \$89,525 in the TD Bank account.

Need to file Pre-Confirmation Certification.

WHEREFORE, Standing Chapter 13 Trustee, Albert Russo, objects to confirmation of the plan.

/s/ Albert Russo

Albert Russo

Standing Chapter 13 Trustee

by: Erik Collazo, Staff Attorney